

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

AMAZON.COM, INC. and AMAZON
DATA SERVICES, INC.,

Plaintiffs,

v.

WDC HOLDINGS LLC dba NORTHSTAR
COMMERCIAL PARTNERS; BRIAN
WATSON; STERLING NCP FF, LLC;
MANASSAS NCP FF, LLC; NSIPI
ADMINISTRATIVE MANAGER; NOVA
WPC LLC; WHITE PEAKS CAPITAL LLC;
VILLANOVA TRUST; CASEY
KIRSCHNER; ALLCORE DEVELOPMENT
LLC; FINBRIT HOLDINGS LLC;
CHESHIRE VENTURES LLC; CARLETON
NELSON; JOHN DOES 1-20,

Defendants.

CASE NO. 1:20-CV-484-RDA-TCB

**MOTION TO INTERVENE FILED BY WILMINGTON TRUST,
NATIONAL ASSOCIATION, AS TRUSTEE FOR THE REGISTERED
HOLDERS OF THE BANCORP COMMERCIAL MORTGAGE 2019-CRE6
TRUST, COMMERCIAL MORTGAGE PASS-THROUGH CERTIFICATES**

Wilmington Trust, National Association, as Trustee for the Registered Holders of the Bancorp Commercial Mortgage 2019-CRE6 Trust, Commercial Mortgage Pass-Through Certificates (the “Lender”), by and through CWC Capital Asset Management LLC, solely in its capacity as Special Servicer, hereby moves pursuant to Fed. R. Civ. P. 24 for entry of an order authorizing it to intervene in the captioned lawsuit (the “Amazon Litigation”) for the limited purpose of moving the Court to modify the Order Appointing Receiver and Ordering Turnover of Property to the Receiver entered by the Court on November 23, 2021 [Docket No. 443] (the “Receiver Order”). The undersigned further certifies that counsel for the movant has conferred

with counsel to Mark Roberts, the receiver previously appointed by the Court, to narrow the issues and the receiver does not consent to the relief requested by the Lender. In support of this motion, movant directs the Court to the accompanying memorandum of law.

Dated: August 24, 2022

/s/ Michael W. Robinson
Michael W. Robinson, Esq.
(VSB No. 26522)
VENABLE LLP
8010 Towers Crescent Drive, Suite 300
Tysons, VA 22182
Phone: (703) 760-1988
Fax: (703) 821-8949
mwrobinson@venable.com

Frederick W. H. Carter, Esq.
(VSB No. 80204)
VENABLE LLP
600 Massachusetts Avenue, NW
Washington, DC 20001
Phone: (202) 344-8191
Fax: (202) 344-8300
fwhcarter@venable.com

*Attorneys for Wilmington Trust, National Association, as
Trustee for the Registered Holders of the Bancorp
Commercial Mortgage 2019-CRE6 Trust, Commercial
Mortgage Pass-Through Certificates, by and through
CWC Capital Asset Management LLC, solely in its capacity as
Special Servicer*

CERTIFICATE OF SERVICE

I hereby certify that on August 24, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system and I served a copy the document upon the following party via U.S. mail to their last-known address:

77 Sugar Creek DE, LLC
c/o The Corporation Trust Company,
Registered Agent
1209 Orange Street
Wilmington, DE 19801

/s/ Michael W. Robinson
Michael W. Robinson, Esq.
(VSB No. 26522)
VENABLE LLP
8010 Towers Crescent Drive, Suite 300
Tysons, VA 22182
Phone: (703) 760-1988
Fax: (703) 821-8949
mwrobinson@Venable.com

Frederick W. H. Carter, Esq.
(VSB No. 80204)
VENABLE LLP
600 Massachusetts Avenue, NW
Washington, DC 20001
Phone: (202) 344-8191
Fax: (202) 344-8300
fwhcarter@Venable.com

*Attorneys for Wilmington Trust, National Association, as
Trustee for the Registered Holders of the Bancorp
Commercial Mortgage 2019-CRE6 Trust, Commercial
Mortgage Pass-Through Certificates, by and through
CWC Capital Asset Management LLC, solely in its capacity as
Special Servicer*